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RULES PROCESSING TEAM

MAR 11 2002

March 7, 2002

Attn: Rules Processing Team (RPT)
Department of the Interior, Minerals Management Service; MS 4024
381 Elden Street
Herndon, Virginia 20170-4817

Re: Notice of Proposed Rulemaking
Procedures for Addressing Sustained Casing Pressure

Gentlemen:

Conoco, Inc., Gulf of Mexico Operations, appreciates the opportunity to comment on the proposed rulemaking. We support the comments on the proposed rulemaking submitted by the Offshore Operators Committee (OOC). Further, we believe that the three-prong approach as outlined in the OOC comments is a more effective method for reducing risk and improving safety in a cost effective manner than a continued prescriptive regulatory approach to sustained casing pressure.

In addition to supporting the OOC comments, we would like to highlight the following areas in the proposed rulemaking that we believe will have serious impacts on our operations in the Gulf of Mexico.

- Ported wellheads, which are designed to accommodate monitoring of casing annuli, introduce an added leak path that could result in an added risk to the environment, the facilities and to personnel safety.
- Monitoring ports and isolation valves are susceptible to failure. Failure would require a well workover, or could result in a junked well. Additional well intervention, resulting from the increased wellhead complexity, would result in added costs and possible added risk to well control events.
- It is important to recognize the differences in design and function between surface wellheads and subsea wellheads. These differences should be considered in any rule making.

We appreciate your careful consideration of these comments concerning this rulemaking.

Sincerely,

Marcel Robichaux
Conoco, Inc.
Drilling Manager, GOM Operations